

Asarco follow up

Intro paragraph stating that the comments are results of the dialog between Asarco and EPA regarding a transition to RCRA Corrective Action. Comments also reflect our review of work to characterize groundwater. Emphasize that additional concerns may be raised as we explore in depth investigations and conclusions.

1. Groundwater Characterization Issues

As and organic issues

RCRA Comments

CERCLA Comments

Suggestion that EPA labs come in and do a study.

BELOW IS A LIST OF ISSUES WE DO NOT WANT TO RAISE YET:

2. Slag Pile

Last attempt to quantify impacts to PP Creek and gw was 12 years ago. Can draw conclusion that PP Creek is being impacted from the data. Since that time significant remediation has occurred at other site. Is it time to try and quantify impacts again? This issue should be pursued further. Is enrichment from slag pile, gw, storm water runoff....?

Sediments in PP Creek and Wilson ditch are heavily contaminated N of Hwy 12. Should an eco evaluation be done? Are there industrial controls?

The test basin results and bottleroll analysis indicate that the slag pile is probably leaching concentrations in excess of the MCL for arsenic and in excess of the SDWA action level for lead. Therefore, the slag pile is likely to be impacting gw and sw, only due to such high concentrations in the aquifer, this impact cannot or has not been able to be measured.

Asarco has stated that you may be able to see an effect on groundwater, if you could get up gradient gw clean enough.

3. Site soils

Last soil investigation was 10 years ago. How have conditions changed since then? Historic data is limited, not enough samples.

Ore Storage Yard values are SHOCKINGLY high. Conclusions that concentrations are attenuated seem to be poorly supported.

Shew Ridge soils may be releasing to environment.
Not looked at as a source of gw contamination.

Acid Plant Sediment Drying Area
See 9/30/96 memo about RCRA issues.

4. Process Water system

Need more work to control leaks in PWS.

Plant water is in Fire Suppression system! Can they use
Upper Lake Water? Should we let them use Plant water?

5. CAMU issues - in letter from DOJ